

# **EXHIBIT B**

## **Joint Statement of the Case**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

IGT and IGT CANADA SOLUTIONS ULC,	)	
	)	
Plaintiffs,	)	
	)	C.A. No. 1:23-cv-00885-ADA
v.	)	
	)	Judge: Honorable Alan D. Albright
ZYNGA INC.,	)	
	)	
Defendant.	)	

**JOINT STATEMENT OF THE CASE**

1. This civil lawsuit is a patent infringement case. The plaintiff is IGT and the defendant is Zynga.
  
2. This case relates to the alleged infringement and invalidity of one patent assigned to IGT: U.S. Patent No. 9,159,189 (referred to as “the ’189 patent” or the “Asserted Patent”).
  
3. IGT accuses Zynga of infringing this patent and further claims that Zynga’s alleged infringement has been and continues to be willful. IGT seeks monetary damages in the form of a reasonable royalty to compensate it for Zynga’s alleged infringement of the ’189 Patent.
  
4. Zynga denies that it infringes the ’189 Patent and further denies that any infringement has been willful. Zynga also asserts that the patent is invalid because, among other things, the invention was invented by other people or was obvious relative to the prior art.
  
5. IGT denies that the ’189 Patent is invalid, and contends that the invention is new and nonobvious relative to the prior art. The parties disagree about whether any damages are appropriate and, if they are, what the amount should be.